REMARKS/ARGUMENTS

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the remarks herewith.

I. STATUS OF THE CLAIMS AND FORMAL MATTERS

Claims 1-13 and 15 are currently pending. Claims 1, 5 and 10, which are independent, are hereby amended. Claim 14 was previously canceled. Support for this amendment is provided throughout the Specification as originally filed and specifically at pages 48-50 of the Specification. No new matter has been introduced by this amendment. Changes to claims are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes are made simply for clarification and to round out the scope of protection to which Applicants are entitled.

II. REJECTIONS UNDER 35 U.S.C. §102(e)

Claims 1-13 and 15 were rejected under 35 U.S.C. §102(e) as allegedly anticipated by U.S. Patent No. 6,081,278 to Chen.

Claim 1 recites, *inter alia*:

"...establishing a dissimilarity threshold <u>by a user-defined setting or an automated setting</u>; and

<u>establishing a temporal threshold</u> as a maximum interval between two segments on a time base,

wherein two segments that <u>have a time gap that exceeds the temporal threshold are determined to be in different scenes</u>." (emphasis added)

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As understood by Applicants, U.S. Patent No. 6,081,278 to Chen relates to an apparatus and method for storing an animation. A set of keyframes created from a video is stored in an animation object. Values that indicate a first sequence of selected keyframes from the set of keyframes is stored in the animation object along with information for interpolating between the keyframes of the first sequence. Values that indicate a second sequence of selected keyframes from the set of keyframes is also stored in the animation object along with information for interpolating between the keyframes of the second sequence.

Applicants submit that nothing has been found in the cited portions of U.S. Patent No. 6,081,278 to Chen (hereinafter, merely "Chen") that would disclose or suggest the above-identified features of claim 1.

Specifically, Applicants submit that nothing has been found in Chen that would disclose or suggest establishing a dissimilarity threshold <u>by a user-defined setting or an automated setting</u> or wherein two segments that <u>have a time gap that exceeds the temporal threshold are determined to be in different scenes</u>, as recited in claim 1.

Therefore, Applicants submit that claim 1 is patentable.

Independent claims 5 and 10 are similar in scope and believed to be patentable for similar reasons.

III. DEPENDENT CLAIMS

Claims 2-4, 6-9, 11-13 and 15 are each dependent from one of the independent claims discussed above and are therefore believed patentable for at least the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however,

the individual reconsideration of the patentability of each on its own merits is respectfully requested.
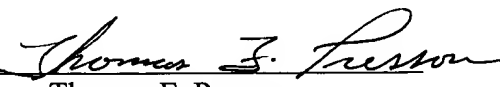
CONCLUSION

In the event the Examiner disagrees with any of statements appearing above with respect to the disclosure in the cited reference, it is respectfully requested that the Examiner specifically indicate those portions of the reference providing the basis for a contrary view.

Please charge any additional fees that may be needed, and credit any overpayment, to our Deposit Account No. 50-0320.

In view of the foregoing remarks, it is believed that all of the claims in this application are patentable and Applicants respectfully request early passage to issue of the present application.

Respectfully submitted,
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